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9 *Glen Littleton and Class Counsel*

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **SAN FRANCISCO DIVISION**

13 IN RE TESLA, INC. SECURITIES
14 LITIGATION

15 Case No. 3:18-cv-04865-EMC

16 **DECLARATION OF ADAM M. APTON
17 IN SUPPORT OF PLAINTIFF'S
18 MOTION FOR ISSUANCE OF A
19 REQUEST FOR JUDICIAL
20 ASSISTANCE (LETTERS ROGATORY)**

21 Date: February 18, 2021

22 Time: 1:30 p.m.

23 Location: Courtroom 5, 17th Floor

24 Judge: Hon. Edward M. Chen

25 Date Action Filed: August 10, 2018

26 I, Adam M. Apton, declare as follows:

27 1. I am attorney at law licensed to practice in State of California, and a partner with the
28 firm Levi & Korsinsky, LLP. I represent Plaintiff Glen Littleton in the above-captioned action. This
declaration is submitted in connection with Plaintiff's Motion for Issuance of a Request for Judicial
Assistance (Letters Rogatory). I have personal knowledge of the facts set forth in this declaration.
If called as a witness, I could and would competently testify thereto.

2. Attached hereto are true and correct copies of the following documents received from the U.S. Securities and Exchange Commission in response to a subpoena for documents:

Exhibit	Document
Exhibit A	SEC-EPROD-000016694
Exhibit B	SEC-EPROD-000009477

3. The Kingdom of Saudi Arabia's sovereign wealth fund named the "Public Investment Fund" is incorporated and headquartered in Saudi Arabia. It does not maintain any offices within the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of January 2021.

s/ Adam M. Apton
Adam M. Apton